

# EXHIBIT “D”

1 UNITED STATES DISTRICT COURT

2 WESTERN DISTRICT OF TEXAS

3 WACO DIVISION

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5 SBI CRYPTO CO., LTD., )  
6 Plaintiff, )  
7 vs. ) 6:23-cv-252-ADA-JCM  
8 WHINSTONE US, INC., )  
9 Defendant. )

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11 \*\* Confidential -- Attorneys' Eyes Only \*\*  
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13 VIDEO DEPOSITION OF

14 JONATHAN TANEMORI

15 August 15, 2024  
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17 DEPOSITION OF JONATHAN TANEMORI, produced as  
18 a witness, duly sworn by me at the instance of the  
19 DEFENDANT, was taken in the above-styled and numbered  
20 cause on August 15, 2024, from 9:01 A.M. to 5:16 P.M.,  
21 before BRANDON D. COMBS, CSR, RPR, in and for the State  
22 of Texas, reported by computerized machine shorthand  
23 at:

24 2728 North Harwood Street, Fifth Floor,  
25 Dallas, Texas

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Transcript of Jonathan Tanemori  
Conducted on August 15, 2024

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1	A.	I'm no longer part of SBI.	09:11:52
2	Q.	When did you leave SBI?	09:11:55
3	A.	I left in March of this year, 2024.	09:11:57
4	Q.	And where do you work now?	09:12:01
5	A.	I'm self-employed.	09:12:03
6	Q.	And so are you being compensated in order	09:12:05
7		to appear here to testify?	09:12:10
8	A.	Yes.	09:12:13
9	Q.	And how are you being compensated?	09:12:13
10	A.	Through an hourly rate through SBI Crypto.	09:12:16
11	Q.	And is there a written agreement that	09:12:23
12		exists between you and SBI Crypto that lays out the	09:12:25
13		terms of your compensation for testifying here	09:12:28
14		today?	09:12:30
15	A.	There is a draft that has not been fully	09:12:31
16		executed yet.	09:12:34
17	Q.	And when you left your association with	09:12:35
18		SBI Crypto, what was your title?	09:12:39
19	A.	It was the general manager for SBI Crypto,	09:12:40
20		among other titles.	09:12:45
21	Q.	And when you say among other titles, what	09:12:50
22		were those other titles?	09:12:52
23	A.	It would be deputy general manager at	09:12:54
24		SBI Investment.	09:12:58
25	Q.	Any others?	09:13:03

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1	Q. (BY MR. SLOVAK) And where do you work	09:51:04
2	now?	09:51:05
3	A. I'm self-employed.	09:51:05
4	Q. Self-employed. I saw in some of your	09:51:08
5	background something about a place called Primal	09:51:10
6	Capital?	09:51:14
7	A. Yes.	09:51:14
8	Q. What is that?	09:51:16
9	A. That's a Web3 investment VC fund. I was	09:51:17
10	there for three months and it wasn't quite what I	09:51:21
11	was looking for and am no longer part of that firm.	09:51:24
12	Q. And what is the hourly compensation that	09:51:26
13	you're being paid to testify here today?	09:51:29
14	A. Here's 400 U.S. dollars per hour.	09:51:31
15	Q. And is that also for time in preparing and	09:51:34
16	travel?	09:51:36
17	A. I believe it is included.	09:51:37
18	Q. And prior to today, what did you do in	09:51:38
19	order to prepare for this deposition?	09:51:42
20	A. I met with Winstead a handful of times to	09:51:46
21	look over some of the documents, primarily the	09:51:50
22	hosting service agreement, the complaint, the	09:51:53
23	numbers that Carson has provided, and a few emails.	09:51:58
24	Q. When you say you met with Winstead, with	09:52:03
25	whom did you meet?	09:52:06

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Transcript of Jonathan Tanemori

Conducted on August 15, 2024

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CERTIFICATE OF REPORTER

I, BRANDON D. COMBS, a Certified Shorthand Reporter, hereby certify that the witness in the foregoing deposition was by me duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a disinterested person, at the time and place therein stated, and that the testimony of the said witness was thereafter reduced to typewriting, by computer, under my direction and supervision;

That before completion of the deposition, review of the transcript was requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am not of counsel or attorney for either or any of the parties to the said deposition, nor in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

DATED: August 29, 2024



BRANDON D. COMBS  
RPR, Texas CSR 10927, California CSR 12978